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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADRIAN TRUJILLO, AND
DAVE GUADALUPE LOPEZ.
Defendants.

CASE NO. 2:22-CR-00204-WBS

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
AND ORDER

DATE: November 6, 2023
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

STIPULATION

1. By previous order, this matter was set for status on November 6, 2023.
2. By this stipulation, defendants now move to continue the status conference until December 11, 2023 at 9:00 a.m., and to exclude time between November 6, 2023, and December 11, 2023, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government recently tendered supplemental discovery pursuant to a protective order. This material includes documents subpoenaed by the Grand Jury and subject to the Court's Protective Order.
 - b) Counsel for defendants desire additional time to review the discovery materials and charges, conduct investigation, conduct research related to the charges, to assess the viability of any pretrial motions, and arrange for in-person visits to discuss potential resolutions with their

1 clients.

2 c) Counsel for defendants believe that failure to grant the above-requested
3 continuance would deny them the reasonable time necessary for effective preparation, taking into
4 account the exercise of due diligence.

5 d) The government does not object to the continuance.

6 e) Based on the above-stated findings, the ends of justice served by continuing the
7 case as requested outweigh the interest of the public and the defendants in a trial within the
8 original date prescribed by the Speedy Trial Act.

9 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
10 *et seq.*, within which trial must commence, the time period of November 6, 2023 to December
11 11, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) [Local
12 Code T4] because it results from a continuance granted by the Court at defendant's request on
13 the basis of the Court's finding that the ends of justice served by taking such action outweigh the
14 best interest of the public and the defendant in a speedy trial.

15 **[CONTINUED ON NEXT PAGE]**

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: November 1, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ ROBERT C. ABENDROTH
ROBERT C. ABENDROTH
Assistant United States Attorney

Dated: November 1, 2023

/s/ TODD DAVID LERAS
TODD DAVID LERAS
Counsel for Defendant
ADRIAN TRUJILLO

Dated: November 1, 2023

/s/ TASHA PARIS CHALFANT
TASHA PARIS CHALFANT
Counsel for Defendant
DAVE GUADALUPE LOPEZ

ORDER

IT IS SO FOUND AND ORDERED.

Dated: November 1, 2023



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE